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6
7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 APPROXIMATELY \$1,537,494.74
SEIZED FROM CHASE BANK, and

14 APPROXIMATELY \$2,601.24 SEIZED
15 FROM BANK OF AMERICA,

16 Defendants.

2:21-MC-00199-WBS-JDP

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Ru
18 Cong Ye (“claimant”), by and through their respective counsel, as follows:

19 1. On or about May 24, 2021, claimants filed a claim in the administrative forfeiture
20 proceeding with the U.S. Customs and Border Protection (“CBP”) with respect to the Approximately
21 \$1,537,494.74 seized from Chase Bank and Approximately \$2,601.24 seized from Bank of America
22 (hereafter “defendant assets”), which were seized on August 3, 2020 and August 4, 2020.

23 2. CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to
24 all known interested parties. The time has expired for any person to file a claim to the defendant assets
25 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant
26 assets as required by law in the administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28

1 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are
2 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
3 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
4 That deadline was August 22, 2021.

5 4. By Stipulation and Order filed August 23, 2021, the parties stipulated to extend to
6 September 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture
7 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
8 to forfeiture.

9 5. By Stipulation and Order filed September 22, 2021, the parties stipulated to extend to
10 October 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
12 to forfeiture.

13 6. By Stipulation and Order filed October 21, 2021, the parties stipulated to extend to
14 November 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
15 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
16 to forfeiture.

17 7. By Stipulation and Order filed November 22, 2021, the parties stipulated to extend to
18 December 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
19 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
20 to forfeiture.

21 8. By Stipulation and Order filed December 27, 2021, the parties stipulated to extend to
22 January 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture
23 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
24 to forfeiture.

25 9. By Stipulation and Order filed January 18, 2022, the parties stipulated to extend to
26 February 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture
27 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
28 to forfeiture.

10. By Stipulation and Order filed February 10, 2022, the parties stipulated to extend to March 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

12. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture shall be extended to April 11, 2022.

Dated: 3/10/2022

PHILLIP A. TALBERT
United States Attorney


By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

Dated: 3/10/2022

/s/ Seth P. Chazin
SETH P. CHAZIN
Attorney for potential claimant
Ru Cong Ye
(Signature authorized by phone)

IT IS SO ORDERED.

Dated: March 11, 2022


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE